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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

PRYMAS VAZ,

Plaintiff,

v.

UR M. JADDOU, in her official capacity,  
Director of USCIS; CONNIE NOLAN, in  
her official capacity, USCIS Acting  
Associate Director for SCOPS,

Defendants.

Case No. 2:21-cv-02204-APG-VCF

**Stipulation and Order for Extension  
of Time**

**(Third Request)**

Plaintiff PRYMAS VAZ, and Defendants UR M. JADDOU, in her official capacity, Director of USCIS and CONNIE NOLAN, in her official capacity, USCIS Acting Associate Director for SCOPS, hereby stipulate and agree that Defendants may have a 70-day extension of time, from July 27, 2022 to October 5, 2022, to respond to Plaintiff's Petition for Writ of Mandamus and Complaint for Declaratory Relief. (ECF No. 3).

This is a mandamus and Administrative Procedure Act action to compel USCIS to adjudicate Plaintiff's U-Visa petition and "application for advance permission to enter as a nonimmigrant." (ECF No. 3p.2). A third extension is warranted because: 1) Plaintiff has not yet responded to the agency's amended request for evidence and the response deadline has been extended to September 25, 2022. A 70-day extension would give Plaintiff time to

1 respond by the October 5, 2022 deadline and the agency time to address that response,  
 2 thereby likely mooted the case. 2) Defense counsel's office has lost a number of attorneys  
 3 and staff. As a result, defense counsel is handling a higher-than-normal caseload. 3) Only a  
 4 limited number of attorneys and support staff may work in defense counsel's office at any  
 5 given time due to the pandemic, thereby slowing the time it takes to process and complete  
 6 required tasks. 4) Defense counsel's calendar has been busier than normal with multiple  
 7 filing deadlines in several cases, including one before the Ninth Circuit. Under the  
 8 circumstances, good cause exists to extend the deadline for Defendants to respond to  
 9 Plaintiff's Petition for Writ of Mandamus and Complaint for Declaratory Relief. *See* Fed.  
 10 R. Civ. P. 6(b)(1)(A) ("When an act may or must be done within a specified time, the court  
 11 may, *for good cause*, extend the time...with or without motion or notice if the court acts, or  
 12 if a request is made, before the original time or its extension expires[.]") (emphasis added).

13 This is the parties' third request for an extension of time. *See* LR IA 6-1(a) (must  
 14 advise of previous extensions). This stipulation is made in good faith and not for the purpose  
 15 of undue delay.

16 DATED: July 27, 2022

17 Bolour/Carl Immigration Group, APC

CHRISTOPHER CHIOU  
 Acting United States Attorney

19 /s/ Scott A. Emerick  
 20 SCOTT A. EMERICK  
 21 Attorney for Plaintiff

/s/ Holly A. Vance  
 HOLLY A. VANCE  
 Assistant U.S. Attorney  
 Attorney for Defendants

23 **IT IS SO ORDERED.**

24 Dated: August 3, 2022.

25  
 26 UNITED STATES MAGISTRATE JUDGE  
 27  
 28